



**Packaging and Printed Paper (PPP)
Program Plan
2017-2021**

March 2017

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List of Acronyms

AMM	Association of Manitoba Municipalities
CBCRA	Canadian Beverage Container Recycling Association
DPPP	Designated PPP
MOU	Memorandum of Understanding
MMSM	Multi-Material Stewardship Manitoba
MIPC	Municipal Industry Program Committee
PPP	Packaging and Printed Paper
P&E	Promotion and Education
SWAT	Solid Waste Advisory Team
WRAP	Waste Reduction and Prevention Act

Introduction

1.1 Multi-Material Stewardship Manitoba Inc.

Multi-Material Stewardship Manitoba Inc. (MMSM) is a not-for-profit industry-funded organization that was formed by representatives of obligated stewards to develop, implement and operate a diversion program for designated packaging and printed paper in the Province of Manitoba, on behalf of its members.

1.2 Regulatory Context

The Packaging and Printed Paper Regulation 195/2008 (“the Regulation”), enacted in December 2008 under the *Waste Reduction and Prevention (WRAP) Act* (“the Act”), established requirements for a stewardship program for packaging and printed paper (PPP) made from paper, plastic, metal or glass, and supplied for use in the Province of Manitoba. An accompanying Guideline for Packaging and Printed Paper Stewardship sets out components to be addressed in a program plan.

1.3 Background

The MMSM Packaging and Printed Paper Program Plan (“the PPP Program Plan” or “the Plan”) was developed in response to the Regulation and was approved by the Minister in September 2009 for a five (5) year term. The MMSM Program launched on April 1, 2010.

In October 2010, MMSM signed a Memorandum of Understanding (MOU) with Canadian Beverage Container Recycling Association (CBCRA). This MOU transferred responsibility of the 75% beverage container recovery target from MMSM to CBCRA.

In October 2014, MMSM requested and received approval for a one (1) year extension on the original MMSM PPP Program five (5) year term. This approval expires November 16, 2016.

1.4 Program Goals and Objectives

The primary goals of the MMSM PPP Program are to promote the reduction, reuse and recycling of designated packaging and printed paper in the province of Manitoba and to sustainably increase recovery and recycling rates of the designated material.

1.5 MMSM Vision and Mission

MMSM’s vision is to be a leader in responsible product stewardship in Manitoba.

MMSM’s mission is to ensure that its members are fulfilling their stewardship requirements under the WRAP Act in a cost effective way.

2 Designated Materials

Section 1 of the Regulation defines the designated materials as follows:

“packaging means any package or container, or any part of a package or container, that is comprised of glass, metal, paper or plastic, or any combination of any of

those materials and includes, but is not limited to, service packaging”; and

“printed paper means paper that is not packaging, but is printed with text or graphics as a medium for communicating information, and includes telephone directories, but does not include: (a) other types of bound reference books; (b) bound literary books; or (c) bound text books”.

The Regulation identifies two categories of packaging:

“pre-packaged goods means goods that are in the packaging in which they would ordinarily be supplied for consumption”; and

“service packaging means packaging that is filled or applied at the point of sale to enable or facilitate the delivery of goods by a retail seller or a food service industry or other service industry outlet”.

As these definitions are broad in scope, the PPP Program Plan further defines packaging and printed papers for purposes of steward reporting and determining eligible program costs. A complete list of packaging and printed paper categories and subcategories is available at www.stewardshipmanitoba.org and is appended to the Rules for Stewards. The complete list can be found in Appendix A.

Packaging that is covered under another stewardship plan is excluded from MMSM’s PPP Stewardship Plan. This packaging is not to be reported by stewards to MMSM. Collection and management costs associated with this packaging are not eligible under MMSM’s PPP Stewardship Plan.

3 Steward Responsibilities

3.1 Obligated Stewards

For the purpose of the PPP Program Plan and determining which person shall be the obligated steward for a particular category of Designated PPP (DPPP), the following provisions shall apply, in the order in which they are set out. For greater certainty, if two or more persons are obligated pursuant to the following categories, the provision which is first in this list shall prevail¹:

- a) A Brand Owner is the obligated Steward with respect to all DPPP and the Packaging of all goods, for which it has a Commercial Connection in the Data Year;
- b) A Franchisor is the obligated Steward with respect to all DPPP and the Packaging of all goods, Supplied within the relevant Franchise System in the Data Year;
- c) In the event that there is no Brand Owner or Franchisor, a First Importer is the obligated Steward with respect to all DPPP and the Packaging of all goods for which it is the First Importer in the Data Year;
- d) In the event there is more than one Brand Owner for the same DPPP, the Brand Owner or First Importer more directly connected to the production of the DPPP shall be the obligated Steward, provided that in the case of a Franchisor who is Resident in Manitoba, the Franchisor shall be the obligated Steward;

¹ Definitions for the capitalized words in a) to h) are in the Steward Rules posted on MMSM’s website at www.stewardshipmanitoba.org.

- e) In the event that consumer products containing two or more independent brands are packaged together for sale in Manitoba, then the Brand Owner more closely associated to the joint packaging shall be the obligated Steward for such joint packaging;
- f) In the event there is not an identifiable brand for a particular DPPP and if the manufacturer of the good is resident in Manitoba, the manufacturer of such good shall be the obligated Steward for such DPPP, otherwise the First Importer shall be the obligated Steward for such DPPP;
- g) Any person who supplies service packaging to consumers in Manitoba in the Data Year; and
- h) Any person who is a voluntary steward in the Data Year.

This description of the obligated steward is subject to revision for clarity and continuous improvement.

3.2 Voluntary Stewards

MMSM has implemented a Voluntary Steward Policy, harmonized with other provinces, that provides reporting flexibility by allowing a company to report and pay fees on behalf of an otherwise obligated steward. The purpose of the process is to provide an opportunity for another company to accept reporting responsibilities and make payments on behalf of a company that would otherwise be the steward in order to reduce the administrative burden on the other steward. A copy of the Voluntary Steward policy is available on our website at www.stewardshipmanitoba.org

3.3 Rules for Stewards

MMSM has developed Rules for Stewards setting out the requirements for reporting and the amount of fees to be paid by participating stewards and/or prescribing methods for determining the amount of the fees. MMSM Rules for Stewards outline the following:

- Definition of stewards;
- Definition of packaging and printed paper;
- Fees for packaging and printed paper;
- Reporting and payment requirements;
- Penalties for late reporting and late payment;
- Allowance for a company to report and pay fees on behalf of an otherwise obligated steward;
- Record retention and audit provisions;
- Steward exemptions; and
- Dispute resolution process.

The Board of MMSM reviews the Rules as required on an annual basis. Notification of all proposed changes to the Rules will be sent to registered stewards and posted on the MMSM website. A notice period of no less than 30 days will be allowed for comment on the proposed changes. Following review of comments received, the Board of Directors of MMSM will vote on proposed changes as per the bylaws of the corporation. Following review and approval by the MMSM Board of Directors, MMSM will communicate to stewards the rule changes to be implemented and the date they will take effect. The current steward rules are available at www.stewardshipmanitoba.org

3.3.1 Online Data Management System

In an effort to promote harmonization with other provincial packaging and printed paper programs, MMSM has contracted with Canadian Steward Services Alliance (CSSA) to provide administrative and steward services, including the use of its Online Steward Data Entry System.

3.3.2 Data Reporting Requirements

Under the PPP Program Plan, stewards are required to report annually to MMSM the total quantity (in kilograms and plastic bag units) of designated packaging and printed paper supplied for use in households in the province.

The reported kilograms of packaging and printed paper are used to determine a steward's total fees payable to MMSM.

In addition, stewards reporting to MMSM are required to:

- Identify the brands, products, customers or suppliers for which the steward is responsible;
- Provide a detailed explanation of the steps taken to calculate the total quantity of packaging and printed paper;
- Provide details on the deducted quantities of designated material that are not supplied to consumers for use in households and available to be managed through Manitoba's residential diversion system (by material type, number of units and weight) and explain the method by which this deduction was derived (e.g., customer sales records, market research, waste audits etc.); and
- Maintain records for a period of at least five years and make these records available to MMSM upon request.

3.3.3 Audit Provisions

Stewards are required to maintain records for a period of at least five years in support of all data submitted to MMSM.

MMSM may examine, audit and inspect a steward's records at any time up to five years after the date of receipt of the related steward report by MMSM. The number of steward reports to be audited in any given program year is determined by MMSM on an annual basis.

3.4 Enforcement Procedures

Through the maintenance of a public registry of identified stewards and the development of a tracking system to monitor compliance, MMSM actively encourages compliance. The registry includes:

1. All persons for which these persons are the obligated stewards under the PPP Program Plan; and
2. All persons for which these persons are the voluntary stewards under the PPP Program Plan.

Field research is performed by MMSM to identify non-compliant stewards, utilizing leads generated by complying stewards, or independently through store and product audits.

MMSM has implemented a non-compliance notification process, including written notification of when reports and fees are due. If stewards and products are identified that have not registered or reported under the Program or another approved packaging and printed material stewardship program, obligated stewards for these materials will be notified. If the Steward’s registration and data submission process is not complete MMSM will follow-up with 30-day, 60-day, 90-day and 120-day notifications. If the Steward’s registration and data submission process is not complete at the end of the 120 days, MMSM may request the Manitoba Government to take enforcement action as stipulated under the WRAP Act.

4 Program Delivery

4.1 Overview

MMSM works with municipalities and other partners to provide Manitoba residents with reasonable access to collection services for PPP. While the type of collection service varies across the province depending on the size, location and characteristics of each community, MMSM works with municipalities to provide effective and efficient residential recycling services that are reasonably consistent for similar types of communities across Manitoba and appropriate for the community type.

Program delivery is governed by the Program Plan and informed by Steward Reporting and feedback from municipalities via the Municipal Industry Programs Committee. Individual participating municipalities manage their recycling systems in accordance with the terms of the services agreement with MMSM. Municipalities provide program performance and financial data to MMSM, which uses the data to calculate the payment amounts owing to each participating municipality. This section describes that process.



4.2 Municipal Collaboration in Establishing Program Context

Given the number of municipalities in Manitoba, MMSM has established the Municipal Industry Programs Committee (MIPC) as a forum to discuss operational issues with representatives from the Association of Manitoba Municipalities (AMM). MIPC provides the forum for MMSM to consult with municipal representatives on various aspects of program delivery, including changes to the services agreement and a review of eligible costs. MIPC will also serve as a means through which Manitoba municipalities are kept informed of changes to the program.

MIPC includes members from MMSM and AMM, and will consider the interests of all municipalities. MIPC is co-chaired by representatives from MMSM and AMM and meets at minimum twice a year.

4.3 Municipal Services Agreement

MMSM will pay 80% of eligible costs² incurred by municipalities to manage designated materials through efficient and effective municipal residential diversion programs. Municipalities wishing to participate in MMSM's program must meet minimum requirements and enter into a services agreement with MMSM. Municipal participation in the MMSM program is voluntary.

The municipal services agreement sets out the minimum requirements that a municipality must meet on a continuous basis in order to be eligible to receive payments under the program. The requirements are intended to support the continued delivery of sustainable residential PPP collection and recycling in Manitoba.

The municipal services agreement will be reviewed periodically by MIPC and will be updated as appropriate to reflect changes to the program.

Municipalities that choose to sign a services agreement will provide certain services to MMSM, including but not limited to the following:

- Resident promotion and education on the proper use of recycling services;
- Collection of the specified types of residential PPP in a manner that is appropriate for the community and in a manner designed to protect the quality of the collected PPP and maximize commodity revenue;
- Delivery of the collected PPP to a processor or broker registered with MMSM;
- Quarterly reporting of the PPP collected, with supporting documentation;
- Participation in the annual cost-monitoring survey; and
- Participation in any field study or audit (financial or performance related) reasonably required by MMSM to meet its program obligations.

The services agreement also:

- Specifies the manner in which payments will be calculated and the frequency of payment;
- Provides the municipality with access to MMSM's technical assistance, including identification of contractual arrangements as well as assistance to promote collection and processing services;
- Requires the municipality to provide MMSM with all necessary financial and non-financial (e.g. performance) related assurances necessary for the program;
- Requires the municipality to provide MMSM with advance written notification of proposed changes to program design and delivery;
- Requires the municipality to provide MMSM standing in the municipal process to determine changes to program design and delivery and to take into consideration any advice received from MMSM; and
- Provides MMSM with the ability to treat costs arising from municipal decisions that do not reflect MMSM's advice on the delivery of effective and efficient residential recycling services as ineligible for the purposes of calculating payments to municipalities.

² Eligible cost categories as of 2010 are listed in Appendix "B"

Municipalities are required, as part of the services agreement, to notify MMSM and consider MMSM's advice prior to:

- Developing, approving or implementing any change in program design or operation that may:
 - Increase the quantity of PPP collected;
 - Increase collection and/or processing costs; or
 - reduce material revenue;
- Preparing or issuing a request for proposals or tender for PPP collection or processing services in a manner that ensures a competitive procurement process;
- Awarding a contract to collect or process PPP from households; or
- Acquiring or modifying any capital assets.

Following notification by a municipality of possible changes to a program, MMSM will provide technical assistance to the municipality during their decision making process. Should the municipality disregard MMSM's advice and implement changes that result in additional costs that MMSM would not incur if the advice had been followed, these costs may be deemed to be ineligible costs.

MMSM may from time to time enter into services agreements with collection agents other than municipalities for the collection and recycling of residential PPP where such additional services are deemed necessary by MMSM.³ Appendix 3 contains a list of municipalities, First Nations and parks currently receiving funding from MMSM.

4.4 Recycling Program Data

4.4.1 Data Reporting Requirements and Verification

MMSM annually collects and analyzes the quantity of PPP collected and directed to a processor or broker registered with MMSM, the costs of operating the recycling program and the commodity revenue received in order to:

- Calculate program performance;
- Determine steward fees;
- Identify opportunities for continuous improvement to increase the material recovery rate and reduce program costs;
- Identify eligible costs; and
- Calculate payments to municipalities to be made in the following year.

The data collected include:

- The quantity of material collected by each collector;
- The quantity of material directed to a processor or broker registered with MMSM;

³ MMSM currently provides direct services for plastic bag collection through events and partnerships with not-for-profit organizations and schools.

- Where services are delivered directly by a municipality:
 - Capital costs for assets such as buildings, vehicles, balers;
 - Staff costs;
 - Operating costs, e.g. fuel, heating;
- Where services are subcontracted by a municipality:
 - Contract costs for recycling collection and processing;
- Cost to transport material to a broker or market;
- Revenue sources and value; and
- Expenditures for promotion and education.

MMSM will verify the data through follow up with municipalities, which may include undertaking an audit of the tonnage data submitted quarterly and the cost and revenue data submitted annually by a municipality or other collector.

4.5 Calculation of Municipal Payments

4.5.1 Approach

MMSM provides payments to municipalities that collect residential PPP using the following service delivery methods:

- Curbside collection in some municipalities;
- Depot collection in other municipalities; and
- Both curbside collection and depot collection operating in parallel in some municipalities.

The municipality receiving payments must meet the following requirements:

- Provide PPP collection services to residents and recycle, or cause to be recycled, the collected PPP; and
- Be in compliance with the services agreement between the municipality and MMSM.

The manner in which payments are distributed is intended to:

- Support convenient, effective and efficient residential PPP collection and recycling services to manage PPP supplied by MMSM stewards;
- Encourage diversion of residentially generated PPP supplied by MMSM Stewards from municipal landfills; and
- Reimburse municipalities for 80% of the net costs to operate efficient and effective programs to manage household PPP supplied by MMSM Stewards.

Payments from MMSM are for the collection and processing of recyclable residential PPP supplied by MMSM stewards. MMSM will not pay municipalities to collect or recycle:

- Materials that are not PPP as defined in the Program Plan;
- PPP from industrial, commercial or institutional (ICI) sources;

- PPP supplied by exempt and non-compliant stewards;
- PPP supplied by stewards that are part of an approved program plan for packaging and paper other than MMSM’s Program Plan; or
- Packaging containers, such as oil, antifreeze and diesel exhaust fluid containers that are intended to be managed by other product management programs.

Once MMSM is confident that the data accurately represents municipal operations, MMSM will analyze the data to benchmark and compare program net costs among Manitoba programs. Data will be sorted to group similar programs by municipal population using the most current census data. In addition to using municipal groups to benchmark effective and efficient program costs, MMSM will provide technical and advisory services to municipalities identified as having excessive costs relative to their group.

Current Municipal Groups⁴:

Municipal Group Population Categories
0 – 5,000
5,001 – 20,000
City of Brandon
City of Winnipeg

Payments to municipalities are based on the sum of eligible administration, operating, promotion and education and capital costs less revenue.

4.5.2 Eligible Administration Costs

Administration costs are costs incurred by municipalities in support of program operations.

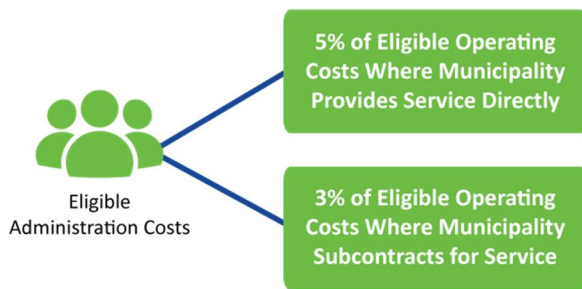
Eligible administration costs are listed in Appendix B, and will be reviewed periodically by MIPC.

The Eligible Administration Costs for each municipality is based on a specified percentage of total eligible operating costs and is currently calculated as follows:

- Municipalities that provide services directly are paid at the rate of 5% of total eligible Operating Costs that are provided directly; and
- Municipalities that contract for services are paid at the rate of 3% of total eligible Operating Costs that are under contract.

The result of the calculation described above is the Eligible Administration Cost.

⁴ The placement of a municipality in a group of municipalities with similar characteristics will be reviewed based on changes in population or other factors that drive recycling costs.



MMSM will review the percentages used to calculate the Eligible Administration Costs periodically through consultation with MIPC. Participating municipalities will be notified of any changes to the percentage by MMSM.

4.5.3 Eligible Net Costs



Eligible Net Costs for each participating municipality are calculated as the sum of Eligible Administration Costs plus Operating Costs plus Promotion and Education Costs plus Capital Costs less Gross Revenue.⁵

Operating Costs include expenditures for the collection, processing, and marketing of residential PPP, whether the service is delivered by the municipality, contracted to the private sector, or a combination thereof.

Promotion and Education Costs include the costs to promote the use of the municipal recycling program and educate residents on local recycling procedures.

Capital Costs include the portion of the amortized capital cost of municipally owned collection vehicles, facilities, fixed and mobile equipment and collection containers used for residential PPP services where the capital costs do not form part of the contracted services provided by private sector contractors.

Gross Revenue includes revenue from the sale of PPP and from the sale of collection containers as well as revenue from grants, waste management service fees or other funding sources that offset the delivery of recycling services.

Eligible Net Costs are divided by the eligible tonnes managed by each municipality to calculate the eligible net cost per tonne for each municipality.

⁵ Eligible cost and revenue categories are listed in Appendix B, and will be reviewed periodically by MIPC.

$$\begin{array}{ccccc}
 \$ & \div & \text{Te} & = & \text{Net Cost Per Tonne for Each Municipality} \\
 \text{Eligible Net Costs} & & \text{Eligible Tonnes} & &
 \end{array}$$

This data is then used to calculate the three year average median net cost per tonne within each municipal group after removing programs with outlier net costs per tonne.

$$\begin{array}{ccccccc}
 \text{Median Net Cost Per Tonne for Each Municipal Group YEAR 1} & + & \text{Median Net Cost Per Tonne for Each Municipal Group YEAR 2} & + & \text{Median Net Cost Per Tonne for Each Municipal Group YEAR 3} & = & \text{3 Year Average Median Net Cost Per Tonne for Each Municipal Group} \\
 \hline
 & & & & 3 & &
 \end{array}$$

Within each municipal group, the three year average median net cost per tonne is multiplied by 80% to calculate the payment rate per tonne in accordance with MMSM’s payment obligation.

$$\begin{array}{ccccc}
 \text{3 Year Average Median Net Cost Per Tonne for Each Municipal Group} & \times & 80\% & = & \text{Payment Rate Per Tonne for Each Municipal Group}
 \end{array}$$

4.5.4 Payments to Municipalities

Participating municipalities that are in good standing with respect to their services agreements will receive four quarterly payments, each equal to one-fourth of the municipality’s calculated annual payment.

Payment to each municipality is based on the payment rate per tonne for its municipal group multiplied by the number of eligible tonnes of residential PPP collected by the municipality in the year during which costs reported in the most recently completed cost monitoring survey were incurred.

$$\begin{array}{ccccc}
 \text{Annual Payment} & = & \text{Payment Rate Per Tonne for Each Municipal Group} & \times & \text{Eligible Tonnes for Each Municipality} \\
 & & & & \text{Te}
 \end{array}$$

5 First Nation and Northern Communities

MMSM continues to strengthen its relationships with First Nations and northern remote communities in Manitoba by providing technical assistance on waste management issues and helping communities increase the effectiveness and efficiency of their recycling programs. Expanding and sustaining recycling in Manitoba's northern communities requires a comprehensive approach that recognizes the unique needs of the region while also setting the direction for long-term efficiency and effectiveness. The readiness of the community to take on these initiatives is also very important.

Some northern communities have, with support and technical assistance from MMSM, developed and sustained a comprehensive recycling program that meets all of the mandatory requirements of the program. These communities are often located near a neighbouring municipality with an established recycling program in place that is willing to collaborate with them. By coordinating their efforts, the communities are able to address operational and logistical challenges like transportation.

MMSM will continue to work closely with other stewardship organizations as a member of SWAT – Solid Waste Advisory Team, and will actively participate in meetings and projects around Manitoba. The objective of the group is to meet and engage other stakeholders, both private and public, that have environmental interests in the province. The team discusses opportunities to improve waste management and recycling in rural/remote communities in Manitoba.

MMSM partners with other stewardship organizations to collect and remove obligated materials. MMSM and the Canadian Beverage Container Recycling Association (CBCRA) have agreed to collaborate where beneficial in order to achieve an effective approach to expanding and sustaining recycling programs in Manitoba's First Nations and remote northern communities. Together we have been working on several initiatives, including collection events and clean-up days, in order to provide services to northern and remote communities in Manitoba. Where possible, feasible and sustainable, we will continue to identify opportunities to work with other organizations and stewardship programs to collect and remove recyclable material from these communities.

Success in expanding recycling in Manitoba's north will depend on strategic alliances and partnerships with key groups, including support from key political and government organizations. Partnering with government funding agencies (INAC, Manitoba Aboriginal and Northern Affairs) will allow MMSM to better understand their existing funding mechanisms and to identify possible cost-sharing opportunities for mutual benefit.

6 Plastic Bag Reduction Program

MMSM along with staff and stewards from the food, beverage and consumer goods sectors,

have taken an effective combination of the 3Rs approach to the use of “single-use” plastic bags. The goal was to reduce the number of empty “single-use” plastic bags disposed in landfill by at least 50%. The primary emphasis was on the reduction of plastic bags supplied into the market. This was followed by the responsible reuse of plastic bags, and thirdly, through increased recycling opportunities for plastic bags. Some of the measures were initiated and undertaken by MMSM; other measures were undertaken by retail stores but all of these efforts have contributed to exceeding count toward the reduction goal.

6.1 Strategy

MMSM and the plastic bag stewards including retailers have taken a multi-pronged 3R approach to achieving the target set forth in the Plastic Bag Guideline.

a) *Plastic Bag Reduction*

Reducing the number of plastic bags supplied into the market is the single most effective measure that industry can take to reach the target. This has been achieved through the following means:

- Enhancement of opportunities to acquire reusable bags in retail stores;
- Focused in-store messaging about the benefits of reusable bags;
- Continued and increased promotion of plastic bag best practices to further reduce the number of bags provided at retail; and
- The use of a fee for plastic bags, where retailers choose to do so, as an incentive for consumers to choose reusable bags.

b) *Plastic Bag Reuse*

Plastic bags are commonly purchased and used to dispose of kitchen, bath, or animal wastes. Consumers are encouraged to reuse single use bags in their home or workplace rather than purchasing new plastic bags to dispose of wastes. Additionally, consumers are encouraged to reuse plastic bags for other domestic uses rather than disposing of them after a “single” use.

MMSM has partnered with Winnipeg Harvest on the Bag It Forward Program, which included the deployment and setup of 300 bins in alternate locations within communities to collect plastic bags for reuse as emergency food hampers. Any bags which are not in good condition are recycled.

Waste audit results over the past several years have shown that Manitobans are reusing single use bags in greater quantities.

c) *Plastic Bag Recycling*

The plastic bag recycling program has two major complementary components.

1. Plastic Bag Collection

A Plastic Bag Recycling Program has been developed which includes the collection of empty plastic bags at retail store locations. The intent of the Plastic Bag Recycling Program is to increase the number of drop-off locations to ensure that Manitobans have reasonably convenient access to plastic bag drop-off locations.

The following types of plastic bags are included in the Program:

- Plastic grocery bags;
- Plastic retail bags with string ties and rigid plastic handles removed;
- Plastic newspaper bags; and
- Plastic dry-cleaning bags.

2. Plastic Bag Recycling Combined with School Education

MMSM has partnered with Take Pride Winnipeg! to offer a school-based program throughout the province. The program links education with direct recycling efforts, thereby creating impacts much greater than only the environmental benefits of recycling plastic bags. A significant component of the Program involves the education of school children on the benefits of reducing the use of, reusing, and recycling plastic bags.

MMSM continues to look for opportunities to work with communities and organizations to promote and educate consumers on the proper disposal of plastic bags.

6.2 Measurement

MMSM collects data from stewards to determine the actual number of plastic bags distributed in the province. Reviews of steward reports are conducted as part of MMSM's efforts to ensure steward compliance, a level playing field and accuracy in reporting.

MMSM will investigate and evaluate additional opportunities to affect positive environmental impacts associated with the use of plastic bags.

6.3 Education and Promotion

MMSM will create a Promotion and Education (P&E) campaign that will educate consumers about the benefits of reducing their usage of plastic bags and of opportunities to recycle their bags. This campaign will consult with key stakeholders, including the Province of Manitoba and municipalities about the P&E program.

6.4 Reporting and Monitoring

The MMSM Annual Report will report on activities and progress made toward the Plastic Bag reduction target. This report will include activities related to plastic bag reduction, and reuse, plastic bag recycling, and industry efforts to increase the percentage of recycled content in plastic bags.

7 Promotion and Education

This section describes the promotion and education (P&E) activities that will support the objectives of the MMSM program.

The P&E program developed by MMSM will focus on two distinct communication components. The first component is identified as "operational" communication support, meaning the strategic and tactical activities required to support operational functions. The second component is identified as "consumer" P&E, which will target consumers and generators of PPP waste to participate in the Program.

The following sections describe the activities to support these two communications components.

7.1 Communication Strategy

MMSM’s communication strategy is dynamic and is updated annually to ensure it incorporates continuous improvement and reflects the evolution of diversion opportunities over the life of the Program Plan. It promotes a call to action – increased recycling and diversion —directly to target audiences employing a wide assortment of tactics aimed at reaching people with messages that capture their attention, prompt them to absorb information and motivate them to adopt and maintain the desired behavior.

Activities include, for example, earned and paid media, educational programs, social media marketing and information on the MMSM website.

7.2 Operational Communications

Stewards require regular communication to help them prepare to meet their reporting and fee-payment obligations. Communication tactics include a website containing a broad range of technical information tailored to steward needs, reporting and filing guidebooks, periodic meetings/consultations, letters of notification and webinars or webcasts.

Similarly, municipalities require communication to help them meet their reporting requirements. Communication tactics include a website containing technical information tailored to municipal needs, a reporting guidebook and webinars or webcasts.

7.3 Consumer P&E

The primary goal of consumer P&E is to increase the recovery rates of PPP in community-based collection services. MMSM uses a mix of communication tools to motivate residents to adopt the desired behaviour. Key features and techniques include:

- A variety of tools to build awareness among residents about appropriate end-of-life management of PPP;
- Targeted school programming for K-12 and post secondary institutions;
- Educating residents about the action required;
- Motivating action (providing a “call-to-action”); and
- Reinforcing and rewarding the newly adopted behaviour by providing information about the result of their action.

P&E activities are set out in a communication strategy that is reviewed and updated annually.

7.4 P&E Activities

Depending on the annual communication strategy and P&E budget, the P&E tactics could include (but not necessarily be limited to):

- Paid media– would require a moderately weighted media campaign designed to reach identified target audiences and focusing on the recycling message;
- Earned Media – news releases and stories that would be disseminated throughout the year; and

- Website – the MMSM website will continue to have a consumer-friendly public interface that will provide information on what can be recycled in each community, as well as general information about the benefits of recycling.

7.5 Research Support

Research is a key building block of an effective communication strategy and will be used in the development of the communication plan and to test creative concepts and messages. It also is necessary to establish the creative elements needed to generate messages that resonate with the various target audiences, triggering the desired response.

8 Program Costs and Cost Recovery

8.1 Annual Fee Setting

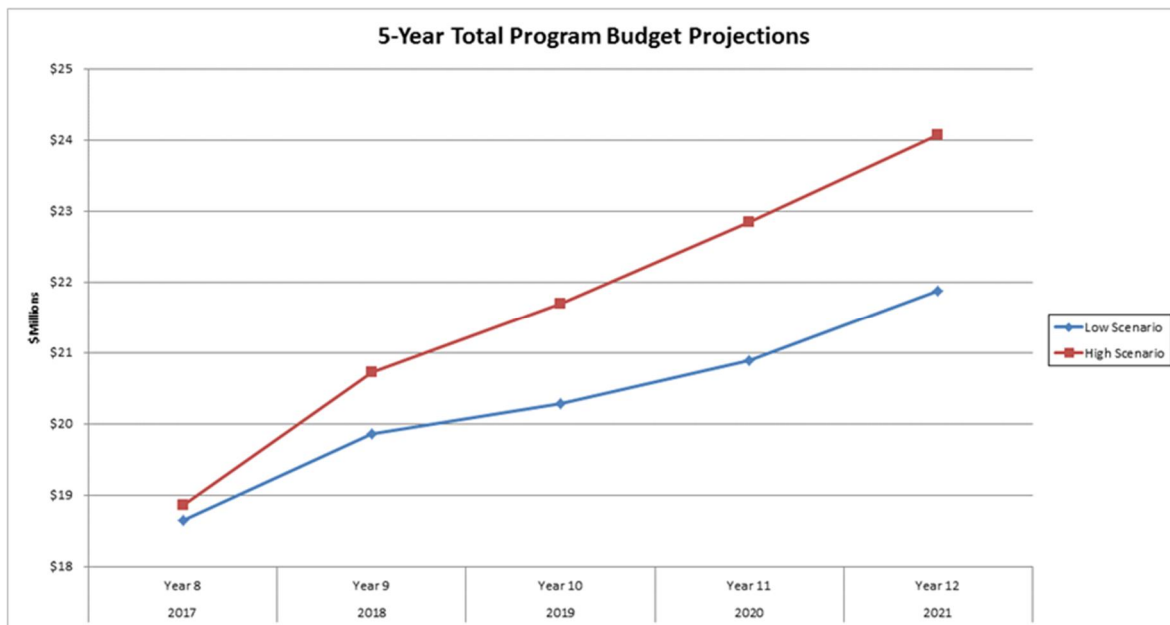
MMSM will establish steward’s fees annually after municipalities have reported their costs for the previous calendar year and these costs have been verified by MMSM.

Fees for the following program year will be determined and approved by the MMSM Board of Directors before the end of October each program year. The methodology used to set fees is principle based and ensures that all obligated parties contribute to the maintenance of the recycling system in a manner which reflects the material’s cost to manage and its commodity value.

8.2 5-Year Cost Projections

The total program costs have been projected for the five years of the Program Plan based on the best available information.

Scenario	2016 (act.)	2017 (est.)	2018 (est.)	2019 (est.)	2020 (est.)	2021 (est.)
Low Scenario	\$16,544,063	\$18,646,936	\$19,858,285	\$20,287,567	\$20,892,485	\$21,880,914
High Scenario		\$18,861,419	\$20,723,882	\$21,687,770	\$22,845,976	\$24,072,080



	Year 8	Year 9	Year 10	Year 11	Year 12
	2017	2018	2019	2020	2021
Low Scenario					
Municipal funding	\$ 15,873,802	\$ 17,001,957	\$ 17,345,550	\$ 17,862,207	\$ 18,759,728
Program management/ P&E	\$ 2,678,134	\$ 2,761,328	\$ 2,847,018	\$ 2,935,278	\$ 3,026,187
Government fees	\$ 95,000	\$ 95,000	\$ 95,000	\$ 95,000	\$ 95,000
Program Cost	\$ 18,646,936	\$ 19,858,285	\$ 20,287,567	\$ 20,892,485	\$ 21,880,914
	Year 8	Year 9	Year 10	Year 11	Year 12
	2017	2018	2019	2020	2021
High Scenario					
Municipal funding	\$ 16,034,438	\$ 17,755,551	\$ 18,571,023	\$ 19,573,392	\$ 20,635,867
Program management/ P&E	\$ 2,731,981	\$ 2,873,330	\$ 3,021,747	\$ 3,177,584	\$ 3,341,213
Government fees	\$ 95,000	\$ 95,000	\$ 95,000	\$ 95,000	\$ 95,000
Program Cost	\$ 18,861,419	\$ 20,723,882	\$ 21,687,770	\$ 22,845,976	\$ 24,072,080

The total program projected costs include the costs to cover government costs as it relates to the PPP Program.

8.3 Interest and Penalties

MMSM charges interest and penalties to stewards that have not submitted fees or stewards that have not registered. Delinquent and later joining stewards are obligated from the date of obligation (April 1, 2010).

Interest and penalties received by MMSM are used to reduce the total steward fees payable in the following year. Any fees paid after the year in which they were due will also be used to reduce the total steward fees payable in the following year.

9 Program Performance Measurement and Reporting

MMSM will report annually on PPP Program performance. This information will be published in the annual report.

Program performance indicators include:

- Steward reported tonnes;
- Municipal eligible recycled tonnes;
- Recycling Rate;
- Population and households with access to PPP Program;
- Recovered kg per capita; and
- Percentage of residents aware of recycling services.

9.1 Recovery Rate Measurement

The recovery rate of the designated materials included in the PPP Program is measured by dividing the total tonnage of designated PPP recovered as reported by municipalities by the total tonnage of designated PPP supplied for use by consumers in households as reported by stewards.

9.2 Environmental and Economic Sustainability

MMSM will consider environmental and economic sustainability as it determines the method by which PPP is managed, such as a particular form of collection service, specific collection locations or an approach to processing.

Local processing and manufacturing into new products will be promoted where both economic and environmental objectives are met.

MMSM will monitor national and international laws and regulations to ensure that the Program is in compliance.

By ensuring that the Program operates in the most sustainably efficient and effective manner, potential negative environmental impacts will be reduced.

9.3 Annual Report

MMSM will report annually on PPP Program performance in its Annual Report. Once the Annual Report is submitted to the Minister, MMSM will post the Annual Report on the MMSM website, as well as provide a printed copy of the Annual Report free of charge, upon request.

10 Stakeholder and Public Consultation

10.1 Program Plan Renewal

The Program Plan renewal submitted to the Minister for approval will include information on the consultation process, participants in the consultation process and comments received by MMSM from participants.

10.2 Ongoing

MMSM consults with stakeholders on a regular basis.

Stakeholders include:

- Stewards of designated packaging and printed paper;
- Municipalities and other service delivery agents;
- The Manitoba Government, specifically the Department of Sustainable Development and Green Manitoba;
- Relevant non-government organizations or agencies; and
- The general public.

Each stakeholder group receives information that is relevant to them, in a timely manner. For example, a change in steward fees will be communicated to stewards but not necessarily to the general public. In contrast, the addition of new materials will be communicated to the general public and all other stakeholders.

The primary communications vehicle will be the MMSM website, accessible to all stakeholders. The website will include information such as, but not limited to, Annual Reports, municipal costs and volume, consultation documents and feedback received during the consultation process, and plastic bag recycling information. All parties interested in a particular aspect of the MMSM decisions or activities will have opportunity to provide feedback via the website or by contacting the appropriate MMSM staff directly.

11 Governance Model

11.1 MMSM Board of Directors

MMSM is governed by a board of directors, consisting of eight industry and two unrelated independent directors. The Board provides valuable input and governance to the organization, and consists of representatives from the following sectors:

- Grocery sector
- Consumer products sector
- Alcohol beverages
- Beverages
- Restaurants
- Retailers
- Printed paper
- Newspapers

The following associations are represented on the MMSM Board:

- Canadian Beverage Association
- Retail Council of Canada
- Manitoba Liquor and Lotteries Corporation
- Food and Consumer Products of Canada
- Restaurants Canada
- Manitoba Newspaper Group
- Dairy Processors of Manitoba
- Canadian Federation of Independent Grocers

Appendix A: Material list with examples

Material Category	Material Sub-Category	Examples <i>(not intended to be a comprehensive list)</i>
Printed Paper	Newsprint	Newspaper publications, newsprint inserts and flyers, product manuals printed on newsprint.
	Magazines and catalogues	Weekly/monthly or annual magazines, retailer seasonal catalogues, travel magazines.
	Directories	Phone books.
	Other Printed Materials	Free promotional calendars and posters; product user guides, warranty cards, product safety information etc.; monthly, quarterly or annual statements; cash register receipts.
Paper Packaging	Gable top containers ó non-beverage	Milk and cream cartons, sugar cartons.
	Gable top containers ó beverage	Ready to serve beverages such as milk and juice cartons.
	Aseptic containers ó non-beverage	Soup, sauce containers.
	Aseptic containers ó beverage	Ready to serve beverages such as juice and milk.
	Paper laminates	Laminated kraft bags, paper hot/cold drink cups, paper ice cream cartons, microwavable paper containers, paper wrap packaging provided with food, such as sandwiches, burgers, or muffins, pet food bags.
	Corrugated cardboard	Television and computer boxes, pizza boxes, paper carry-out bags.
	Boxboard and other paper packaging	Cereal boxes, tissue boxes, clothing hang tags, shoe boxes, egg cartons, formed coffee take-out trays, the roll inside of toilet paper, paper towel, tin foil and plastic wrap, boxboard shipping boxes used for direct mail to residential customers.
Plastic Packaging	PET bottles < 5 Litres - non-beverage	Salad dressing bottles, edible oil bottles, peanut butter jars.
	PET bottles >= 5 Litres ó non-beverage	Salad dressing bottles, edible oil bottles.
	PET bottles < 5 Litres ó beverage	Soft drink, juice, and water bottles.
	PET bottles >= 5 Litres ó beverage	Water bottles.
	HDPE bottles and jugs < 5 Litres - non-beverage	Laundry detergent, shampoo, bleach, vinegar, body wash, household cleaning products.
	HDPE bottles and jugs >= 5 Litres ó non-beverage	Laundry detergent and bleach.
	HDPE bottles and jugs <5 Litres - beverage	Juices, milk.
	HDPE bottles and jugs >=5 Litres ó beverage	Juices, milk.
	Polystyrene	Hot drink cups, clamshell containers, foam packaging for electronics and appliances, foam packing -peanutsøand meat trays.
	Other rigid plastic <5 Litres - non-beverage	Margarine tubs, hand cream tubes, microwaveable trays.
	Other rigid plastic >=5 Litres ó non-beverage	Pails.
	Other rigid plastic <5 Litres -beverage	Juice bottles and jugs.
	Other rigid plastic >= 5 Litres ó beverage	Juice bottles and jugs.
	LDPE/HDPE film	Fresh and frozen vegetable bags, milk bags, diaper packaging, shrink wrap around products (e.g. tray of 24 water bottles), dry cleaner bags, soil and fertilizer bags, film used around newspapers.
	LDPE/HDPE film carry-out bags	Plastic shopping bags.

Material Category	Material Sub-Category	Examples (<i>not intended to be a comprehensive list</i>)
	Plastic laminates ó non-beverage	Pouches for fresh pasta, dry pasta packaging, cheese wrap, candy wrappers, chip bags, cereal liner bags, bubble wrap.
	Plastic laminates ó beverage	Drink pouches containing juice or milk.
	Biodegradable plastic film	Vegetable bags, food film.
	Biodegradable plastic film carry out bags	Shopping bags
	Biodegradable rigid plastic containers ó non-beverage	Trays, pails, lids.
	Biodegradable rigid plastic containers ó beverage	Beverage containers.
Steel and Other Metal Packaging	Other steel and metal containers and packaging ó non-beverage	Food cans such as soup, lids and closures.
	Other steel and metal containers and packaging ó beverage	Ready to serve beverages such as cans of juice, energy drinks.
	Paint cans ó non-HHW related containers	Steel paint cans for paint and coatings not obligated under the Waste Prevention and Protection Act, Household Hazardous Material and Prescribed Material Stewardship Regulation such as automotive, marine, and arts and craft paint and coatings.
	Aerosol containers ó non-HHW related containers	Steel aerosol containers used for products not obligated under the Waste Prevention and Protection Act, Household Hazardous Material and Prescribed Material Stewardship Regulation, such as air freshener, deodorant and hairspray containers, food spray cans, and polish spray cans.
Aluminum Packaging	Aluminum ó food cans	Pet food, sardines.
	Aluminum cans ó beverage	Ready to drink beverages including juice, iced tea, energy drinks, soft drinks
	Aluminum aerosols ó non-HHW related containers	Aluminum aerosol containers used for products not obligated under the Waste Prevention and Protection Act, Household Hazardous Material and Prescribed Material Stewardship Regulation such as such as air freshener spray cans, hairspray cans, food spray cans, deodorant spray cans, mousse spray cans.
	Foil and other aluminum packaging	Foil wrap supplied to the residential consumer as service packaging, pie plates, yogurt/sour cream seals, frozen food trays.
Glass Packaging	Clear (flint) glass ó non-beverage	Food containers such as pickle, salsa, tomato sauce and jam jars, cosmetic containers for creams.
	Clear (flint) glass ó beverage	Ready to serve beverages such as juice, water, iced tea, lemonade, wine, spirits.
	Coloured glass ó non-beverage	Olive oil bottles, balsamic vinegar bottles, cosmetic containers for creams.
	Coloured glass ó beverage	Ready to serve beverages such as juice, water, wine & spirits.

Appendix B – Eligible Cost and Revenue Categories

The eligible cost categories stated herein are effective as of [date] and are subject to change from time to time at MMSM's sole discretion following discussion with MIPC.

Eligible Administration Costs

Administration costs are costs incurred by municipalities in support of PPP program operations. Eligible administration costs include the portion of the following cost items that are attributable to residential PPP program operations:

- Financial, including accounts payable and receivable, purchasing, payroll and audit;
- Human Resources, including health and safety, labour and employee relations, training and development;
- Information Technology, including electronic databases to record and track PPP tonnage information; and

Specifically excluded are costs associated with elected officials and corporate governance, or the cost of any study or audit required to be undertaken by the municipality as part of its services to MMSM.

Eligible Service Delivery Costs

Service Delivery Costs include expenditures for the collection and processing of residential PPP, whether the service is delivered by the municipality, contracted to the private sector, or a combination thereof. If the service is contracted to the private sector, the direct service delivery cost is the collection and processing fees charged by the contractor to the municipality. If the service is delivered by the municipality, direct service delivery costs include:

- Payroll costs of recycling collection truck drivers and sorters at a material recovery facility;
- Services such as utilities, insurance, equipment repair and maintenance;
- Supplies such as fuel, baling wire, Blue Boxes; and
- Rent or lease costs for buildings, equipment or vehicles;

Eligible Promotion and Education Costs

Promotion and Education Costs include the costs to promote the use of the municipal recycling program and educate residents on local recycling procedures.

Eligible Capital Costs

Capital Costs include the portion of the amortized capital cost of municipally owned collection vehicles, facilities, fixed and mobile equipment, and collection containers used for residential PPP services where the capital costs do not form part of the contracted services provided by private sector contractors. Any grants for capital improvements will be subtracted from the amortized capital costs determined for the municipality.

Gross Revenue

Gross Revenue includes revenue from the sale of PPP, revenue from the sale of collection containers, and revenue from grants, municipal waste management service fees or other funding sources that offset the delivery of recycling services.

Appendix C: List of Municipalities, Parks, First Nations

Alexander, R.M.
Altona, Town
Arborg, Town
Argyle, R.M.
Armstrong, R.M.
Beausejour, Town
Bifrost-Riverton, Municipality
Boissevain-Morton, Municipality
Brandon, City
Brenda-Waskada, Municipality
Brokenhead, R.M.
Carberry, Town
Carman, Town
Cartier, R.M.
Cartwright-Roblin Municipality
Clanwilliam-Erickson, Municipality
Coldwell, R.M.
Cornwallis, R.M.
Dauphin, City
Dauphin, R.M.
De Salaberry, R.M.
Deloraine-Winchester, R.M.
Dufferin, R.M.
Dunnottar, Village
East St. Paul, R.M.
Ellice- Archie, R.M.
Elton, R.M.
Emerson-Franklin, Municipality
Ethelbert, Municipality
Fisher, R.M.
Flin Flon, City
Gilbert Plains Municipality
Gillam, Town
Gimli, R.M.
Glenboro South Cypress, Municipality
Glenella-Lansdowne, Municipality
Grahamdale, R.M.
Grandview Municipality
Grassland, Municipality
Grey, R.M.
Hamiota Municipality
Hanover, R.M.
Harrison Park, Municipality
Headingley, R.M.
Kelsey, R.M.
Killarney - Turtle Mountain, R.M.
La Broquerie, R.M.
Lac du Bonnet, R.M.
Lac du Bonnet, Town
Lakeshore, R.M.
Leaf Rapids, Town
Lorne, Municipality
Louise, Municipality
MacDonald, R.M.
Matheson Island
McCreary, Municipality
Melita, Town
Minitonas-Bowsman, Municipality
Minnedosa Town
Montcalm, R.M.
Morden, City
Morris, R.M.
Morris, Town
Mossey River, R.M.
Mountain, R.M.
Neepawa, Town
Niverville, Town
Norfolk Treherne, Municipality
North Cypress-Langford, Municipality
North Norfolk, Municipality
Oakland-Wawanesa, Municipality
Oakview, R.M.
Pembina, Municipality
Pinawa L.G.D.
Pine Dock, Town
Piney, R.M.
Pipestone, R.M.
Portage la Prairie, City
Portage la Prairie, R.M.
Powerview - Pine Falls, Town
Prairie Lakes, R.M.
Prairie View Municipality
Reynolds, R.M.
Rhineland, Municipality
Ritchot, R.M.
Riverdale, Municipality
Roblin, Municipality

Rockwood, R.M.
Roland, R.M.
Rosedale, R.M.
Rossburn Municipality
Rosser, R.M.
Russell Binscarth, Municipality
Selkirk, City
Sifton, R.M.
Snow Lake, Town
Souris-Glenwood, Municipality
Springfield, R.M.
St. Andrews, R.M.
St. Clements, RM
St. François-Xavier, R.M.
St. Laurent, R.M.
St. Pierre-Jolys, Village
Stanley, R.M.
Ste. Anne, R.M.
Ste. Anne, Town
Ste. Rose, Municipality
Steinbach, City
Stonewall, Town
Stuartburn, R.M.
Swan River, Town
Swan Valley West, Municipality
Tache, R.M.
Teulon, Town
The Pas, Town
Thompson, City
Thompson, R.M.
Two Borders, Municipality
Victoria Beach, R.M.
Victoria, R.M.
Virden, Town
Wallace-Woodworth, R.M.
West Interlake, R.M.
West St. Paul, R.M.
WestLake-Gladstone, Municipality
Whitehead, RM
Whitemouth, R.M.
Winkler, City
Winnipeg Beach, Town
Winnipeg, City
Woodlands, R.M.
Yellowhead, R.M.

First Nations

Peguis First Nation

Swan Lake First Nation

Opaskawayak Cree Nation

Wabowden-Setting Lake

Provincial and National Parks

Riding Mountain National Park

Duck Mountain Provincial Park

Falcon Lake/Westhawk

Hecla Grindstone Provincial
Park

Grand Beach Provincial Park

Paint Lake Provincial Park

Post Secondary Educational Institutions

University of Manitoba (2 campuses)

University of Winnipeg

Red River College (2 campuses)

College Universitaire de Saint Boniface

Assiniboine Community College

Brandon University

University College of the North

Packaging and Printed Paper Program Plan

Appendix D: Consultation Communications Distributed March 7, 2016

Multi-Material Stewardship Manitoba Inc. (MMSM) PPP Program Plan is up for renewal. We are committed to a consultation process that allows all interested parties and affected industry stakeholders the opportunity to provide their valuable input toward the development of the revised PPP Program Plan.

MMSM's original PPP Program Plan was approved by Manitoba Conservation and Water Stewardship in 2009. We are inviting producer and stakeholder comments on the revised PPP Program Plan that is intended to highlight how the program will continue to fulfill the requirements as outlined in accordance with the Packaging and Printed Paper Stewardship Regulations (Man. Reg. 195/2008). Comments received by March 31, 2016 will be considered when finalizing the plan for submission to Manitoba Conservation and Water Stewardship by May 1, 2016.

The majority of changes can be found in Section 4 and represent enhancements to service contracts with municipal service providers, which better define the role and responsibilities of the parties. These enhancements will serve to help improve the program's effectiveness and efficiency in coming years. Where possible, MMSM has also harmonized definitions and policies with other programs.

The 2017-2021 PPP Program Plan is available at:
<http://stewardshipmanitoba.org/stewards/whats-new/>

Please submit your comments by email to Karen Melnychuk, Executive Director, at kmelnychuk@stewardshipmanitoba.org or by mail at 200-283 Bannatyne Avenue, Winnipeg, Manitoba, R3B 3B2.

We look forward to the opportunity of continuing our commitment to Manitobans by providing the best residential recycling programs possible!

Sincerely,

Karen Melnychuk
Executive Director



200-283 Bannatyne Avenue, Winnipeg, MB R3B 3B2
Phone: (204) 953-2011 | Cell: (204) 792-5469
www.stewardshipmanitoba.org | www.simplyrecycle.ca

Packaging and Printed Paper Program Plan

Multi-Material Stewardship Manitoba Inc. (MMSM) PPP Program Plan is up for renewal. We are committed to a consultation process that allows all interested parties and affected municipal stakeholders the opportunity to provide their valuable input toward the development of the revised PPP Program Plan.

MMSM's original PPP Program Plan was approved by Manitoba Conservation and Water Stewardship in 2009. We are inviting producer and municipal stakeholder comments on the revised PPP Program Plan that is intended to highlight how the program will continue to fulfill the requirements as outlined in accordance with the Packaging and Printed Paper Stewardship Regulations (Man. Reg. 195/2008). Comments received by March 31, 2016 will be considered when finalizing the plan for submission to Manitoba Conservation and Water Stewardship by May 1, 2016.

The 2017-2021 PPP Program Plan is available at:
<http://stewardshipmanitoba.org/municipalities/whats-new/>

Please submit your comments by email to Karen Melnychuk, Executive Director, at kmelnychuk@stewardshipmanitoba.org or by mail at 200-283 Bannatyne Avenue, Winnipeg, Manitoba, R3B 3B2.

We look forward to the opportunity of continuing our commitment to Manitobans by providing the best residential recycling programs possible!

Sincerely,

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Packaging and Printed Paper Program Plan

Appendix E: Summary of Comments Received

Stakeholder	Question and/or Comments	Response	Revisions made to MMSM Renewal
Steward Association	Requested additional information on the five year projection in Section 7.3 Expressed concerns on their sector's representation on the MMSM Board.	Provided additional information on five year projection. Thanked for their comments, they will be reviewed by MMSM Board.	
Steward	Comments on deminimus not being applicable to non-resident stewards who sign voluntary steward agreements.	Thanked for their comments, they will be reviewed by MMSM Board.	
Municipal Government	No concerns on MMSM's Program Plan Renewal. Thanked for the opportunity to participate.	Thanked for their comments, they will be reviewed by MMSM Board.	
Municipal Government	Pleased with MMSM's PPP Program. Program has worked very well for the municipality.	Thanked for their comments, they will be reviewed by MMSM Board.	
Municipal Government	No comments on renewal. Comments regarding concerns with commercial recycling.	Thanked for their comments, they will be reviewed by MMSM Board.	
Supplier to MMSM	Expressed support on a variety of promotional and educational programs of MMSM.	Thanked for their comments, they will be reviewed by MMSM Board.	
Non-Government Organization	Expressed support to MMSM's Bag it Forward: Plastic Bag Recycling Program and the Program Plan Renewal.	Thanked for their comments, they will be reviewed by MMSM Board.	
Non-Government Organization	Expressed support on MMSM's Program Plan Renewal, initiatives on plastic bag programs, and educational projects.	Thanked for their comments, they will be reviewed by MMSM Board.	
Steward Association	Comments on harmonization with other provincial programs where possible. Requested additional information on the five year projection in Section 7.3 Expressed concerns on their sector's representation on the MMSM Board.	Provided information on fee methodology review consultation. Provided additional information on five year projection. Thanked for their comments, they will be reviewed by MMSM Board.	
Municipal Government	Expressed support of MMSM's Program Plan Renewal and educational programs.	Thanked for their comments, they will be reviewed by MMSM Board.	

Packaging and Printed Paper Program Plan

Group			
Steward Association	<p>Provided comments in support of steward rules. Requested that the notification process be clearly stated in the Program Plan Renewal. Provided comments on Section 4.1 Under Program Delivery. Requested additional information on the five year projection in Section 7.3 Comments on the review of the fee setting methodology. Comments on a harmonized set of metrics. Commended MMSM for specifying its Board composition.</p>	<p>Provided additional information on five year projection. Provided information on fee methodology review consultation. Thanked for their comments, they will be reviewed by MMSM Board.</p>	Revision to Section 3.4 Enforcement Procedures
Steward Association	<p>Comments on the review of the fee setting methodology. Comments on encouraging collaboration to improve material recycling rates. Commended MMSM for its transparency with making available the annual detailed fee calculation tables.</p>	<p>Provided information on fee methodology review consultation. Thanked for their comments, they will be reviewed by MMSM Board.</p>	
Non-Government Organization	<p>Expressed support of MMSM’s educational programs.</p>	<p>Thanked for their comments, they will be reviewed by MMSM Board.</p>	
Municipal Government	<p>Expressed support of MMSM and the expertise, commitment, educational programs, various tools and resources that have been made available.</p>	<p>Thanked for their comments, they will be reviewed by MMSM Board.</p>	

Packaging and Printed Paper Program Plan

Appendix F: Comments Received and MMSM Responses

Karen Melnychuk - MMSM

From: Karen Melnychuk - MMSM
Sent: Monday, April 11, 2016 11:47 AM
To: 'Warrington Ellacott'
Subject: RE: MMSM Seeking Feedback on Revised PPP Program Plan

Dear Mr. Ellacott,

Thank you for your email regarding the renewal of Multi-Material Stewardship Manitoba's (MMSM) Printed Paper Packaging Program (PPP) Plan. We appreciate the time and effort you put into commenting on our draft plan.

MMSM is committed to the consultation process, allowing all interested parties and affected industry stakeholders the opportunity to provide their valuable input toward the development of the revised PPP Program Plan. Invitations for comments were sent to over 1600 municipal and industry stakeholders.

MMSM is required under the Manitoba PPP Guidelines to provide a five-year projection as part of its program plan renewal. The projection is based on the best available information and was developed using several trending factors including: the Consumer Price Index; collection capital investments such as potential deployment of recycling carts by some municipalities; declining commodity revenues, and increased collections. These are factors impacting all municipalities and therefore increasing overall program costs.

The most significant contributor to the cost projections is the realization of the full impact of the improved recovery performance in the City of Winnipeg. Stewards may recall from the two previous fall fee consultations that the City of Winnipeg moved to a cart collection and this increased the tonnage collected. As Winnipeg represents 60% of MMSM's tonnage and cost, and as we've been updating stewards each year when we provide them with our annual budget and fees, Winnipeg's recent upgrades to carts has resulted in cost increases. Municipal funding is calculated on a three-year rolling average, and 2017 will be the first full year that the impacts from the City of Winnipeg are seen.

Please note that these cost projections do not include the many cost efficiencies that MMSM continues to explore with its municipal service provider partners. We will continue to work directly with all Manitoba municipalities on optimizing efficiencies in their residential recycling programs, standardizing the number of mandatory materials required for funding and grassroots educational programs.

The MMSM PPP program is for residential recycling in Manitoba only. Durable goods such as major appliances are not designated materials in our program. Durable goods manufacturers are represented on the MMSM Board by retailers.

Your comments will be reviewed by the staff and Board of Directors of MMSM.

If you have any further questions, please don't hesitate to contact me at kmelnychuk@stewardshipmanitoba.org.

Regards,

Karen Melnychuk
Executive Director



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From: Warrington Ellacott [mailto:warrington_ellacott@whirlpool.com]
Sent: Monday, March 07, 2016 1:54 PM
To: Karen Melnychuk - MMSM
Subject: Re: MMSM Seeking Feedback on Revised PPP Program Plan

Good Afternoon Ms. Melnychuk,

Thank you for the opportunity to provide comment on the proposed program plan.

In general, there is inadequate substantiation of costs and return on investment (ROI). The estimated costs are projected to rise up to \$24 million which ranges between 36-42% (\$12.73 / capita up to \$17.32 / capita). MMSM should expand on this substantially to justify the significant increase in costs preferably by each of the drivers in the plan.

In terms of governance it should be noted the major appliance industry (our sector), or durable goods manufacturers are not represented on the board or represented by an association. Greater diversity of the board is an area which should be explored.

Thank you.

On Mon, Mar 7, 2016 at 11:01 AM, Karen Melnychuk - MMSM <KMelnychuk@stewardshipmanitoba.org> wrote:

Multi-Material Stewardship Manitoba Inc. (MMSM) PPP Program Plan is up for renewal. We are committed to a consultation process that allows all interested parties and affected industry stakeholders the opportunity to provide their valuable input toward the development of the revised PPP Program Plan.

MMSM's original PPP Program Plan was approved by Manitoba Conservation and Water Stewardship in 2009. We are inviting producer and stakeholder comments on the revised PPP Program Plan that is intended to highlight how the program will continue to fulfill the requirements as outlined in accordance with the Packaging and Printed Paper Stewardship Regulations (Man. Reg. 195/2008). Comments received by March 31, 2016 will be considered when finalizing the plan for submission to Manitoba Conservation and Water Stewardship by May 1, 2016.

The majority of changes can be found in Section 4 and represent enhancements to service contracts with municipal service providers, which better define the role and responsibilities of the parties. These enhancements will serve to help improve the program's effectiveness and efficiency in coming years. Where possible, MMSM has also harmonized definitions and policies with other programs.

The 2017-2021 PPP Program Plan is available at: <http://stewardshipmanitoba.org/stewards/whats-new/>

Please submit your comments by email to Karen Melnychuk, Executive Director, at kmelnichuk@stewardshipmanitoba.org or by mail at 200-283 Bannatyne Avenue, Winnipeg, Manitoba, R3B 3B2.

We look forward to the opportunity of continuing our commitment to Manitobans by providing the best residential recycling programs possible!

Sincerely,

Karen Melnychuk

Executive Director



200-283 Bannatyne Avenue, Winnipeg, MB R3B 3B2

Phone: (204) 953-2011 | Cell: (204) 792-5469

www.stewardshipmanitoba.org | www.simplyrecycle.ca



Karen Melnychuk - MMSM

From: Karen Melnychuk - MMSM
Sent: Monday, April 11, 2016 11:30 AM
To: 'Scott Macdonald'
Subject: RE: MMSM Seeking Feedback on Revised PPP Program Plan

Dear Mr. Macdonald,

Thank you for your recent letter regarding the renewal of Multi-Material Stewardship Manitoba's (MMSM) PPP Program Plan. We appreciate the time and effort you put into commenting on our draft plan.

MMSM is committed to the consultation process, allowing all interested parties and affected industry stakeholders the opportunity to provide their valuable input toward the development of the revised PPP Program Plan. Invitations for comments were sent to over 1600 municipal and industry stakeholders.

Thank you again for your response to the draft renewal of the PPP Program Plan. Your comments will be reviewed by the staff and Board of Directors of MMSM.

If you have any further questions, please don't hesitate to contact me at kmelnichuk@stewardshipmanitoba.org.

Regards,

Karen Melnychuk
Executive Director



200-283 Bannatyne Avenue, Winnipeg, MB R3B 3B2
Phone: (204) 953-2011 | Cell: (204) 792-5469
www.stewardshipmanitoba.org | www.simplyrecycle.ca



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From: Scott Macdonald [mailto:ism@rainfresh.ca]
Sent: Monday, March 07, 2016 10:48 AM
To: Karen Melnychuk - MMSM
Subject: RE: MMSM Seeking Feedback on Revised PPP Program Plan

Hi Karen,

My only comment is that as a voluntary non-resident steward with minimal sales in Manitoba, we are not treated the same as a small resident steward. Our sales are below the level that would allow a resident obligated steward to be exempt of fees. We are required to pay fees from dollar 1, we believe. As such Manitoba is displaying inequity in its treatment of small non-resident stewards. Since Manitoba knows who all the stewards are and has calculated the minimum levels for exemption, there is no reason that it cannot treat all small stewards the same. The system now puts non-resident voluntary small volume stewards at a competitive disadvantage to local small players.

If for some reason our interpretation is incorrect, please advise and we will withdraw the comment.

Kind Regards,

Scott Macdonald B.Sc., MBA, President

Envirogard Products Limited, 6-446 Major Mackenzie Dr. E., Richmond Hill, ON L4C 1J2 Canada

T: (905)884-9388, F: (905)884.3532

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From: Karen Melnychuk - MMSM [<mailto:KMelnychuk@stewardshipmanitoba.org>]

Sent: March-07-16 11:02 AM

To: undisclosed-recipients:

Subject: MMSM Seeking Feedback on Revised PPP Program Plan

Multi-Material Stewardship Manitoba Inc. (MMSM) PPP Program Plan is up for renewal. We are committed to a consultation process that allows all interested parties and affected industry stakeholders the opportunity to provide their valuable input toward the development of the revised PPP Program Plan.

MMSM's original PPP Program Plan was approved by Manitoba Conservation and Water Stewardship in 2009. We are inviting producer and stakeholder comments on the revised PPP Program Plan that is intended to highlight how the program will continue to fulfill the requirements as outlined in accordance with the Packaging and Printed Paper Stewardship Regulations (Man. Reg. 195/2008). Comments received by March 31, 2016 will be considered when finalizing the plan for submission to Manitoba Conservation and Water Stewardship by May 1, 2016.

The majority of changes can be found in Section 4 and represent enhancements to service contracts with municipal service providers, which better define the role and responsibilities of the parties. These enhancements will serve to help improve the program's effectiveness and efficiency in coming years. Where possible, MMSM has also harmonized definitions and policies with other programs.

The 2017-2021 PPP Program Plan is available at: <http://stewardshipmanitoba.org/stewards/whats-new/>

Please submit your comments by email to Karen Melnychuk, Executive Director, at kmelnychuk@stewardshipmanitoba.org or by mail at 200-283 Bannatyne Avenue, Winnipeg, Manitoba, R3B 3B2.

We look forward to the opportunity of continuing our commitment to Manitobans by providing the best residential recycling programs possible!

Sincerely,

Karen Melnychuk
Executive Director



200-283 Bannatyne Avenue, Winnipeg, MB R3B 3B2
Phone: (204) 953-2011 | Cell: (204) 792-5469
www.stewardshipmanitoba.org | www.simplyrecycle.ca



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Karen Melnychuk - MMSM

From: Village of McCreary <mccreary@mymts.net>
Sent: Friday, March 18, 2016 2:14 PM
To: Karen Melnychuk - MMSM
Subject: Feedback - Revised Packaging and Printed Paper Program Plan

The Council of the Municipality of McCreary had no concerns to raise but would like to thank you for the opportunity to participate.

Wendy L. Turko, CMMA
Chief Administrative Officer
MUNICIPALITY OF McCREARY
P. O. Box 338 -432 First Avenue
McCREARY, MB ROJ 1B0
Telephone: 1 (204) 835-2341 (Direct Line)
General Office: 1 (204) 835-2309
Fax: 1 (204) 835-2649

Karen Melnychuk - MMSM

From: Virginia Rempel <VRempel@cityofwinkler.ca>
Sent: Friday, March 18, 2016 9:03 AM
To: Karen Melnychuk - MMSM
Subject: Letter of Support

Good Morning,

This letter is to confirm that we have been very pleased with MMSM's PPP Program. It has worked very well for our municipality.

Thank you.

Virginia Rempel, C.M.M.A.

Planning & Engineering Department
City of Winkler
204.325.9524 ext. #3
vrempel@cityofwinkler.ca

Karen Melnychuk - MMSM

From: Karen Patterson <kpatterson@killarney.ca>
Sent: Thursday, March 24, 2016 1:56 PM
To: Karen Melnychuk - MMSM
Subject: FW: Program Plan Renewal

From: Karen Patterson [<mailto:kpatterson@killarney.ca>]
Sent: March-24-16 1:07 PM
To: 'mmelnychuk@stewardshipmanitoba.org' <mmelnychuk@stewardshipmanitoba.org>
Subject: Program Plan Renewal

Hi Karen

I have reviewed the Program Plan Renewal document and it appears the plan is not changing from the existing program, so we have no comments.

However, I'd like to comment at this time and there really needs to be a commercial recycling program for municipalities.

We are currently introducing a new curbside pickup in our communities however are unable to offer the commercial businesses any assistance with the pickup of their recycling. We are no longer picking up any commercial recycling, which we did before, but due to the fact our funding is only given to us for residential recycling, we are no longer offering the commercial businesses that service. We have contracted our recycling pickup out and that business has contacted all our commercial businesses to see if they'd like a recycling pickup service, which they are responsible for paying for, many businesses are declining the service due to costs. We are very concerned that some of that recycling may end up out at our landfill site. This issue definitely needs to be addressed. Even if the commercial recycling only included cardboard to start with, that would be a huge asset.

Thank you

Karen Patterson
Finance Manager
Municipality of Killarney – Turtle Mountain



Direct Focus Marketing Communications

Letter of Recommendation

Re: Multi-Material Stewardship Manitoba

To whom it may concern:

Multi-Material Stewardship Manitoba (MMSM) is a client of Direct Focus. We work extensively with them on projects that have a positive and lasting impact on recycling awareness in our community. As MMSM's service provider, we've helped them stay abreast of new marketing trends and improve their educational reach.

One aspect of our collaborative working relationship is concept development, where we brainstorm and develop ideas to increase awareness and knowledge about recycling. Together, we design and deploy traditional and digital marketing and communication tactics that grab attention, help raise community awareness, engage citizens in learning about recycling, and educate people of all ages about many aspects of recycling.

We've worked with MMSM on many worthwhile and socially responsible projects. The first involved their website, www.simplyrecycle.ca. Since mobile use surpassed desktop use in 2014¹, MMSM wanted to make their primary educational resource more accessible to community members on their smartphones and tablets. In 2014-2015, we made [simplyrecycle.ca](http://www.simplyrecycle.ca) "responsive" (mobile friendly) as well as easier to find on search engines.

Another project, "Bag it Forward," was a plastic-bag recycling program in which 350 branded bins were deployed to Winnipeg Harvest and their partners, giving Manitobans more options for recycling plastic bags. Direct Focus designed the logo and signage for the bins. Our own office bin has collected 45 lbs of bags since the program kicked off in 2015.

We were especially proud to imagine, create and develop a digital "recycling journey" for schools, to help students learn about recycling through a fun and interactive website. Aimed at grades 2 to 4, *A Tale of Recycling* takes students through both recycling and garbage cycles of a discarded soup can. The site is set to launch this spring, following an already-successful pilot program in a test classroom.

Our current project with MMSM is their 2016 General Awareness Campaign. The goal is to build on what people already know about recycling in Manitoba and to give them detailed information about what is recyclable, based on results from a research survey. The hashtag #KnowYourRecyclables will help generate conversation about recycling on social media.

MMSM is extremely committed to improving the recycling landscape for Manitobans, and they're going about getting the word out in all the right ways to reach relevant audiences in public spaces, online, in schools, on devices and through social media. We deeply appreciate their vision and passion, and we enjoy working with them to make their marketing goals a reality—which also translates into a greener community for everyone to enjoy.

Sincerely,

Taylor Crawford, President

Direct Focus Marketing Communications

416.818.6977 | 204.947.7152

¹ <http://www.smartinsights.com/mobile-marketing/mobile-marketing-analytics/mobile-marketing-statistics/>



1085 Winnipeg Ave
Winnipeg, Manitoba
R3E 0S2

Tel: (204) 982-3663
Fax: (204) 775-4180

www.winnipeg Harvest.org

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Robert Tapper

Ex-Officio

David Northcott CM, OM, BSc
Executive Director

To whom it may concern:

Since April 2015, Winnipeg Harvest has been a proud partner with the Multi-Material Stewardship Manitoba in the *Bag it Forward: Plastic Bag Recycling Program*.

We fully support their program plan renewal for the Packaging and Printed Paper Program Plan as our joint initiative has been such a success.

In nearly a year, we have distributed nearly 260 bins across the city with a continued call out to food distribution agencies to sign onto this initiative. The bins have also produced inspiring results with 633 pounds of plastic grocery bags at Winnipeg Harvest. The plastic bags are either recycled or used for emergency food kits.

As an organization that goes through approximately one million plastic bags a year, we seized the opportunity with delight when MMSM approached us to participate in this sustainable and green program.

The program has had a visible effect on benefiting us and the food distribution agencies we deal with.

MMSM are responsible for helping us move forward down the greening path we are working towards. We thank them for their green efforts and these tangible outcomes would not have been possible without their Bag it Forward initiative.

Regards,

Kate Brenner
Managing Director, Winnipeg Harvest



March 30, 2016

To Whom It May Concern;

This letter is to confirm Take Pride Winnipeg's support for the renewal of the Multi-Material Stewardship Manitoba (to be called MMSM) Packaging and Printed Paper Program for 2017-2021. Since its inception, MMSM has been a great partner with Take Pride Winnipeg in several of our initiatives. Their support has helped to make these initiatives extremely successful over the years.

Bag Up Manitoba is a program where elementary schools collect plastic bags and film, which then gets recycled into Frisbees, bird houses, flower boxes and benches for the schools. In 2015, there were 160 schools that participated in the program, and the students brought in 1,495,000 plastic bags – that all got recycled. This program not only teaches the students about recycling, but also reuse and reducing the amount of plastic.

MMSM's residential recycling program has been a great success and recycling rates are increasing throughout the province because of the efforts of MMSM. Take Pride Winnipeg partnered with MMSM to have a recycling mural painted on Selkirk Avenue and McGregor Street in Winnipeg. This was done to help encourage residents to recycle more, and it has helped the area.

Team Up To Clean Up, Take Pride's program to get citizens out in the spring and fall picking up litter and recycling has over 20,000 volunteers annually participate in the program. There is a kick off event at the MTS Centre for students and MMSM is always present to help the students learn about environmental issues. They are always asked to speak at this and other Take Pride events, including our Sustainability Day and our most recent Manitoba Eco Awareness Day/Fashion Fest (where we had nineteen students dressed in outfits made from recyclable materials). We look forward to working with MMSM in the future on these programs and others down the road.

Overall, Multi Material Stewardship Manitoba has been done a tremendous job in helping to make Manitoba a better place in which to live, and I strongly support the renewal of their program for another five years.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Ethans', is written over a horizontal line.

Tom Ethans
Executive Director
Take Pride Winnipeg



April 11, 2016

Mr. Matthew Holmes
Chief Executive Officer
Magazines Canada
425 Adelaide St. E. Ste. 700
Toronto, Ontario M5V 3C1

Dear Matthew:

Thank you for your recent letter regarding the renewal of Multi-Material Stewardship Manitoba's (MMSM) PPP Program Plan. We appreciate the time and effort you put into commenting on our draft plan.

MMSM is committed to the consultation process, allowing all interested parties and affected industry stakeholders the opportunity to provide their valuable input toward the development of the revised PPP Program Plan. Invitations for comments were sent to over 1600 municipal and industry stakeholders.

CSSA, MMSM's service provider, has been leading the review of the fee setting methodology, on behalf of the provincial programs. A steward committee was formed in early 2015, of which Magazines Canada is a member of. Consultation on the proposed new methodology begins in April 2016. Notices of the consultation have been distributed by CSSA. MMSM anticipates the new fee setting methodology will be implemented for setting the 2017 fees. If required, MMSM will consider a phased-in approach.

MMSM is required under the Manitoba PPP Guidelines to provide a five-year projection as part of its program plan renewal. The projection is based on the best available information and was developed using several trending factors including: the Consumer Price Index; collection capital investments such as potential deployment of recycling carts by some municipalities; declining commodity revenues, and increased collections. These are factors impacting all municipalities and therefore increasing overall program costs.

The most significant contributor to the cost projections is the realization of the full impact of the improved recovery performance in the City of Winnipeg. Stewards may recall from the two previous fall fee consultations that the City of Winnipeg moved to a cart collection and this increased the tonnage collected. As Winnipeg represents 60% of MMSM's tonnage and cost, and as we've been updating stewards each year when we provide them with our annual budget and fees, Winnipeg's recent upgrades to carts has resulted in cost increases. Municipal funding is calculated on a three-year rolling average, and 2017 will be the first full year that the impacts from the City of Winnipeg are seen.



SimplyRecycle.ca

Please note that these cost projections do not include the many cost efficiencies that MMSM continues to explore with its municipal service provider partners. We will continue to work directly with all Manitoba municipalities on optimizing efficiencies in their residential recycling programs, standardizing the number of mandatory materials required for funding and grassroots educational programs.

In Manitoba, all newspapers are obligated stewards, and must register and report. Fees are invoiced and collected.

Thank you again for your response to the draft renewal of the PPP Program Plan. Your comments will be reviewed by the staff and Board of Directors of MMSM.

If you have any further questions, please don't hesitate to contact me at kmelnychuk@stewardshipmanitoba.org.

Sincerely,

Karen Melnychuk
Executive Director
Multi-Material Stewardship Manitoba

Magazines Canada

425 Adelaide St. W. Ste. 700
Toronto ON CAN M5V 3C1
Telephone: 416.504.0274
Facsimile: 416.504.0437

www.magazinescanada.ca

March 30, 2016

Ms. Karen Melnychuk, Executive Director
Multi-Material Stewardship Manitoba (MMSM)
200-283 Bannatyne Avenue
Winnipeg, Manitoba R3B 3B2.
kmelnichuk@stewardshipmanitoba.org

Re: MMSM Packaging and Printed Paper Program Plan Renewal 2017-2021

Dear Karen:

Thank you for the opportunity to add Magazines Canada's comments to Multi-Material Stewardship Manitoba's draft PPP Program Plan Renewal consultation process.

We appreciate the work that MMSM and CSSA has contributed to-date to the ongoing need for harmonizing Manitoba's Blue Box program with others across the country. It is essential that all jurisdictions work together to streamline any and all strategic and operational details so that desired efficiencies can be found. Harmonization must remain a key priority for MMSM and all other provincial jurisdictions to ease the financial and administrative burden on Blue Box Stewards.

Nevertheless, we are very concerned that total MMSM program cost projections are expected to increase between 32% and 46% over the next 5 years with double digit growth in each of the first two years going forward. We ask for insight into the cost drivers behind these large annual increases. The magazine industry has already endured enormous fee increases of nearly 400% since MMSM's inception and 180% since 2014, substantially higher than total program averages. We are very troubled by the prospect of new double- (and perhaps triple-?) digit magazine fee increases despite MMSM recognition that magazines and other printed papers are being unfairly treated by today's broken fee setting methodology which requires the payment of fees in excess of the cost to manage those materials. We remain hopeful that CSSA's ongoing fee setting methodology review will remedy this situation but necessary approvals and/or the potential multi-year phase-in of a new fee structure will take time leaving magazines vulnerable to increasingly unfair fee hikes. How can MMSM mitigate unfair magazine fee increases until a new, fairer fee setting methodology is fully operational so that magazines aren't paying more than their fair share?

Adding to the above concern is the composition of MMSM's Board of Directors as it relates to printed papers. We continue in our belief that magazine and other printed paper Stewards are not well represented. It is our view that newspaper industry representation on the MMSM Board sends an inappropriate message to all other Stewards, not only because of the patchwork of noncompliance and special deals that characterize newspaper participation across the country, but more specifically because Manitoba's newspaper industry does not pay into the MMSM system. Magazines and all other printed paper materials, representing nearly 50% of Manitoba's total Blue Box tonnage, deserve representation from someone who

The logo for Magazines Canada, featuring the words "Magazines" and "Canada" in a white, sans-serif font, stacked vertically. The text is set against a dark red background that has a curved, wave-like bottom edge on the right side.

**Magazines
Canada**

has “skin in the game” and who can best embody the unique needs of printed paper Stewards. Magazines Canada supports change to ensure strong, positive printed paper representation going forward.

Magazine Stewards look forward to the day when a level playing field is finally achieved for magazine Stewards, and others, in Manitoba. We ask MMSM to creatively consider options that will ensure a fair and equitable solution to ongoing magazine industry issues, not only in the long term but in the short term as well. Magazines Canada remains committed to working with MMSM and CSSA to achieve fair-minded resolutions that benefit us all.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Holmes".

Matthew Holmes
Chief Executive Officer, Magazines Canada
mholmes@magazinescanada.ca

**Magazines
Canada**

March 31, 2016

Re: 2017-2021 PPP Plan

Dear Karen,

I am the Chairman of the South Mountain Waste Management Group that manages the recycling program of the municipalities of Clanwilliam-Erickson and Harrison-Park as well as Riding Mountain National Park.

I have reviewed the proposed plan for 2017-2021 and agree that this plan meets the needs of our municipalities and has been effective in delivering recycling to our people. We have received practical advice whenever we have requested support and although we are located three hours from Winnipeg there has been no hesitation for face to face meetings.

Support for educational programs has been good and transparency in the program is clear.

We support the proposed plan and hope that the Manitoba Government will endorse the program for another five years.

Yours truly

Don Huisman

Chairman

South Mountain Waste Management Group



April 11, 2016

Ms. Nathalie St-Pierre
Vice-President – Sustainability and Quebec
Retail Council of Canada

Dear Nathalie:

Thank you for your recent letter regarding the renewal of Multi-Material Stewardship Manitoba's (MMSM) PPP Program Plan. We appreciate the time and effort you put into commenting on our draft plan.

MMSM is committed to the consultation process, allowing all interested parties and affected industry stakeholders the opportunity to provide their valuable input toward the development of the revised PPP Program Plan. Invitations for comments were sent to over 1600 municipal and industry stakeholders.

RCC's comments related to Section 3 and 4 of the Program Plan Renewal will be reviewed by MMSM staff and the Board of Directors.

MMSM is required under the Manitoba PPP Guidelines to provide a five-year projection as part of its program plan renewal. The projection is based on the best available information and was developed using several trending factors including: the Consumer Price Index; collection capital investments such as potential deployment of recycling carts by some municipalities; declining commodity revenues, and increased collections. These are factors impacting all municipalities and therefore increasing overall program costs.

The most significant contributor to the cost projections is the realization of the full impact of the improved recovery performance in the City of Winnipeg. Stewards may recall from the two previous fall fee consultations that the City of Winnipeg moved to a cart collection and this increased the tonnage collected. As Winnipeg represents 60% of MMSM's tonnage and cost, and as we've been updating stewards each year when we provide them with our annual budget and fees, Winnipeg's recent upgrades to carts has resulted in cost increases. Municipal funding is calculated on a three-year rolling average, and 2017 will be the first full year that the impacts from the City of Winnipeg are seen.

Please note that these cost projections do not include the many cost efficiencies that MMSM continues to explore with its municipal service provider partners. We will continue to work directly with all Manitoba municipalities on optimizing efficiencies in their residential recycling programs, standardizing the number of mandatory materials required for funding and grassroots educational programs.



CSSA, MMSM's service provider, has been leading the review of the fee setting methodology, on behalf of the provincial programs. A steward committee was formed in early 2015. Consultation on the proposed new methodology begins in April 2016. Notices of the consultation have been distributed by CSSA. The MMSM Board of Directors will review all feedback received during the consultation process. MMSM anticipates the new fee setting methodology, if approved by the Board of Directors, will be implemented for setting the 2017 fees. If required, MMSM will consider a phased-in approach.

MMSM is working with other provinces on several national harmonization activities, including performance metrics.

Thank you again for your response to the draft renewal of the PPP Program Plan. Your comments will be reviewed by the staff and Board of Directors of MMSM.

If you have any further questions, please don't hesitate to contact me at kmelnychuk@stewardshipmanitoba.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K Melnychuk', is written in a cursive style.

Karen Melnychuk
Executive Director
Multi-Material Stewardship Manitoba



March 31, 2016

Karen Melnychuk
Executive Director
Multi-Material Stewardship Manitoba
200-283 Bannatyne Avenue
Winnipeg, MB R3B 3B2

Via email: KMelnchuk@stewardshipmanitoba.org

RE: Feedback on MMSM Packaging and Printed Paper Program Plan Renewal 2017-2021

Dear Karen:

On behalf of members of the Retail Council of Canada (RCC), I would first like to thank MMSM for providing stakeholders with an opportunity to comment on the proposed Printed Paper Program Plan 2017-2021. The following is RCC's feedback on the proposed program plan.

The Retail Council of Canada (RCC) is a not-for-profit, industry-funded association representing more than 45,000 store fronts of all retail formats, including department, grocery, independent merchants, regional and national specialty chains, and online merchants.

RCC is a strong advocate for retailing in Canada and works with all levels of government and with other stakeholders to support employment growth and career opportunities in retail, to promote and sustain retail investments in communities from coast-to-coast, and to enhance consumer choice and industry competitiveness. RCC also provides its members with a full range of services and programs including education and training, benchmarking and best practices, networking, advocacy, and industry information. RCC's members:

- Take part in close to a hundred environmental stewardship programs across the country and are called upon to expand their role as new ones are developed.
- Welcome the opportunity to manage efficient and relevant environmental stewardship programs.
- Spend millions of dollars on environmental and sustainable activities every year and are continually putting additional resources into managing the growing number of programs. These costs are ultimately reflected in the prices that consumers pay and hence delivery of the right outcomes at the lowest cost to consumers should be the goal of this process.

Generally speaking, most of the proposed program plan follows the content of the plan currently in effect. RCC would like to take this opportunity to improve the proposed plan with a series of recommendations.

RCC supports the cascading priority framework proposed in section 3.1 with regards to the definition of obligated stewards. This reflects the understanding that brand owners should be first seen as the obligated party, followed by the franchisor if no brand owner in the province. If none of the first two are found in the province, only then should we look at first importers, who are retailers in most cases. RCC also appreciates that voluntary stewards are specifically listed in the definition of steward as well as in section 3.2, confirming the status of voluntary stewards in the plan to be approved by government. However, RCC feels that the plan should further indicate that voluntary stewards are approved for calendar years and are liable for materials they take responsibility for during the course of a given year. In the light of the Worthington case in Ontario, first obligated stewards need to get some insurance that a stewardship organization will not go back to them once a year's books have been closed to collect fees left unpaid by a voluntary steward that decided to exit the program in the middle of the year. RCC recommends that such mention be added to the proposed plan.

With regards to section 3.3 – *Rules for stewards*, while RCC clearly approves any defined comment period, members would like to make sure a 90-day period is observed prior to the implementation of any new dispositions as a result of amendments to the rules for stewards. This 90-day advance notice is a standard principle that RCC has been advocating in all of our discussions with stewardship organizations for the past several years. While we recognize most changes might not necessarily require 90 days to implement, adopting such a systematic procedure would be not only a courtesy to stewards but would also avoid having to assess how long of a notice should stewards be provided every time a change is made to the rules.

Section 3.4 discusses enforcement procedures in case of non-compliance. While it is our general understanding that the notification process detailed in the current program plan would still prevail until the escalation policy developed by CSSA is adopted, RCC feels it would be relevant to keep providing timings in this section. Retailers identify free riders as one of the priority issues they face in ensuring a level playing field in funding stewardship programs and RCC would like to ensure these rules are publicly known for all stewards and clearly stated in the plan. RCC agrees that there is a need for an escalation policy to further detail the procedures to enforce. However, our members are not comfortable with the plan mentioning an escalation policy that is not yet published without any mention of timings. As per government requirement, the current plan details the procedures in such cases. RCC recommends that MMSM include in the proposed plan the timeframe used in the current plan as a means to reiterate the rules that are to be followed until a new policy is adopted.

Under section 4.1, RCC recommends that MMSM add a requirement for municipalities to submit costs that have been audited by a third party, as an additional cost containment measure and verification. This approach currently required for Quebec municipalities improves credibility of figures provided and aligns with standard business practices when a company commits to funding another business' activities.

In addition, as a transitional measure before the disposition allowing MMSM to directly deliver recycling services kicks in, RCC recommends that penalties be included in the plan and service agreements for municipalities that don't align with MMSM's requirements. The delivery of the service involves a certain level of risk for MMSM and having a series of transitional penalties would ensure that MMSM handling the service rather than a municipality is only considered as last resort.

RCC members fully support to new municipal cost control dispositions proposed in this plan under section 4.3.2. This section would require municipalities to notify or consult with MMSM during any decision-making process that would see a municipality

- increase the quantity of PPP collected;
- increase collection and/or processing costs; or
- reduce material revenue;
- prepare or issue a request for proposals or tender for PPP collection or processing services;
- award a contract to collect or process PPP from households; or
- acquire or modify any capital assets.

“Should the municipality disregard MMSM’s advice and should the changes implemented by the municipality add costs to the system that would not be incurred if MMSM were to be responsible for program design and delivery, these costs will be deemed to be ineligible costs.”

In order to clarify which costs are considered ineligible, MMSM should include a schedule of ineligible costs in the proposed plan, as provided in the current funding agreements. With major changes currently underway in the collection and sorting approaches for several municipalities, these new dispositions could prove to be efficient in preventing unjustified/ not sufficiently justified cost increases. If properly presented to the government, RCC is confident that the Minister will agree to this approach.

RCC members are concerned with the 5-year cost projections presented in the plan. While recent changes brought to the curbside services (cart model pick-up) and material sorting facility (enhanced sorting capacity) in Winnipeg explain the significant increase planned for 2017 as tonnage are expected to raise in the city, RCC urges MMSM to effectively enforce the dispositions with regards to municipal costs and non-compliant stewards proposed in this plan to control as much as possible the fee increases that are planned for stewards over the next 5 years. RCC believes cost projections and containment should require a transparent communication process with contributing stewards to ensure all are aware of the reasons explaining why such increases are foreseen in the coming years.

With regards to the expected fee-setting methodology, RCC believes MMSM should provide in the proposed plan, out of transparency, a sense of the timing and next steps for MMSM’s adoption of the methodology. As CSSA engages in a consultation period, it appears critical that MMSM indicates how it intends to handle the feedback received on the methodology. This can only improve stewards’ trust in the organization and their understanding of the fees they pay.

With regards to Program Performance Measurement and Reporting, RCC asks MMSM and the other provincial PPP programs to adopt common wording for performance metrics. Currently, stewards are not in a position to compare the levels performance of the various provincial programs. A harmonized set of metrics would allow comparability and would help municipalities and stewardship organizations improve their level of efficiency in program delivery. In addition, RCC recommends that section 8.2 require a periodical activity-based cost analysis to ensure cost data is the most credible possible. This would further inform on the levels of contamination or residues and the handling of orphan materials. On that point, RCC strongly recommends MMSM to adopt mechanisms capping funding for costs related to orphan or non-designated materials

as an additional means to contain increasing costs. MMSM should make sure such mechanism is at least included in its funding/service agreements with municipalities.

Finally, with regards to governance, RCC commends MMSM for specifying its board composition. While our members feel retailers should be even more represented on the board, to reflect the level of their contributions out of the total fees paid to the program, few other organizations have been that clear in detailing their board composition. RCC sees this as more than positive in its collaboration with MMSM.

RCC will continue to inform and provide support to ensure its members are aware of their obligations and are able to comply in the most efficient way and at the lowest costs. Should you have any further questions, please do not hesitate to contact me.

Yours sincerely,



Nathalie St-Pierre
Vice-president – Sustainability and Québec
Retail Council of Canada
nst-pierre@cccd-rcc.org
514-982-0267 ext. 331



April 11, 2016

Ms. Isabelle Faucher
Managing Director
Carton Council of Canada

Dear Isabelle:

Thank you for your recent letter regarding the renewal of Multi-Material Stewardship Manitoba's (MMSM) PPP Program Plan. We appreciate the time and effort you put into commenting on our draft plan.

MMSM is committed to the consultation process, allowing all interested parties and affected industry stakeholders the opportunity to provide their valuable input toward the development of the revised PPP Program Plan. Invitations for comments were sent to over 1600 municipal and industry stakeholders.

Thank you again for your response to the draft renewal of the PPP Program Plan. Your comments will be reviewed by the staff and Board of Directors of MMSM.

If you have any further questions, please don't hesitate to contact me at kmelnychuk@stewardshipmanitoba.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K Melnychuk', is placed above the typed name.

Karen Melnychuk
Executive Director
Multi-Material Stewardship Manitoba



Toronto, March 31st 2016

Ms. Karen Melnychuk
Executive Director, Multi-Material Stewardship Manitoba
200-283 Bannatyne Avenue,
Winnipeg, MB R3B 3B2

Re: MMSM Revised PPP Program Plan

Dear Karen,

Thank you for the opportunity to provide comments on MMSM's revised Packaging and Printed Paper Program Plan. We would like to comment on two areas that are not specifically addressed in the revised plan: dis-aggregating carton fees and encouraging collaboration to improve carton recycling.

Dis-aggregating carton fees

We are aware that MMSM, with CCSA, is currently undertaking a review of the fee setting methodology, as referred to in section 7.1 of the revised plan, and we are registered to attend the April 21st consultation meeting at which a new methodology will be proposed. As you know, we presented to the Steward Consultation Committee overseeing the fee setting methodology review project in July 2015. We would like to take this opportunity to reiterate our continued concern that fees for cartons are aggregated with other paper-based packaging that do not perform as well on the recycling front. This continues to unjustifiably disadvantage cartons in the marketplace, such that carton fees continue to lose ground to those of competing formats. We strongly urge MMSM to dis-aggregate cartons from other lower recovery material categories. We believe the fee setting methodology project provides the appropriate opportunity for movement on this front.

In order to move forward with disaggregation however, cartons require their own fee category, which is not the case at the moment under MMSM's program. This requires the introduction of two new data points. Firstly, if they are not already doing so, stewards should be required to report the quantity of gable top and aseptic cartons that they supply to residential consumers in Manitoba, separately from the broad "Polycoat & Laminates" fee category¹.

Secondly, the quantity of cartons marketed should be determined. We are aware that cartons are generally marketed in polycoat bales and that each municipality may market a different grade depending on what they collect and sort. For example, as you know the City of Winnipeg, which represents over 60% of the population of the province, accepts cartons in their residential recycling program (paper laminants are not accepted). The Material Recycling Facility that processes their material (Emterra Environmental) markets a polycoat grade that is mostly made

¹ It appears from the 2016 National Steward Guidebook and 2016 Manitoba Materials' List that stewards already are reporting Gable Top and Aseptic Containers as stand-alone subcategories.



up of cartons. Given this, MMSM would need to undertake bale composition audits to determine the relative quantities of cartons recovered and marketed as is done in Ontario. We assume this already is being done to determine the quantities of other fibre materials like magazines and catalogues within mixed paper and ONP bales and the data for cartons may already be tracked.

Moreover, the revenue that is realized from the sale of recovered cartons should be tracked separately and attributed to cartons. The current aggregation distributes some of the revenue earned for cartons to laminates. In its fee setting calculations MMSM currently does not present cost and revenue separately – only net cost. However, we assume municipalities and their service providers are reporting revenue for specific materials where possible.

In addition to leveling the playing field between cartons and paper laminants, creating carton-specific fee rates would allow us to track improvements in cartons' performance, both on the revenue and the recovery side. As you know, the Carton Council of Canada's mandate is to grow carton recycling nationally and this is consistent with the objectives of MMSM's proposed plan. The lack of these data in Manitoba makes it challenging to advance our mission in this province at the moment.

Encouraging collaboration to improve carton recycling

To that end, we did not find any references in the revised Program Plan to the establishment of potential partnerships and collaboration with committed stakeholders as ourselves in order to grow the recovery and recycling of materials. Indeed, the Continuous Improvement Program (CIP) described in section 4.6 of the original plan, which put a priority on efficiency & effectiveness, including the improvement of collection and processing of designated PPP materials is not present in the revised plan. As such, we would like to take this opportunity to reiterate our willingness to collaborate with MMSM – whether it be on benchmarking and studies (e.g. bale audits), awareness raising, or any other initiative that would help grow carton recycling in the province. In that sense, we are delighted that you have reached out on a possible collaboration for your 2016 Promotion and Education Campaign and we look forward to joining efforts with you on this.

I would be more than happy to discuss the contents of our submission in more details with you. In closing, we would like to take this opportunity to commend MMSM for the level of transparency it has demonstrated and continues to demonstrate, by making available the detailed calculation table (Fee Calculation Model) for each annual fee cycle. As you know, such information-sharing is essential for active participation and contribution by stakeholders regarding the performance of specific materials, such as ourselves.

Regards,



Isabelle Faucher
Managing Director, Carton Council of Canada



March 31, 2016

RE: Multi-Material Stewardship Manitoba
Packaging and Printed Paper (PPP) Program Plan Renewal

To Whom it concerns:

Multi-Material Stewardship Manitoba (MMSM) has been a key partner with The Forks in Winnipeg since 2012. As the Presenting Sponsor of our Target Zero Eco-Kids Tour, MMSM has been actively involved and instrumental in helping us launch a program about sustainability, targeted at school groups.

We have an ambitious goal at The Forks, to reduce our greenhouse gas emissions to zero – Target Zero. Our extensive initiatives include geothermal heating and cooling of The Forks Market; water conservation and grey water collection; the use of biofuel in all our site vehicles; commercial grade bio-composting and site-wide recycling.

When The Forks was about to launch a 60-minute Eco Tour for school groups as part of our education program – MMSM was more than ready to sponsor the program, contribute content, and provide messaging around Reduce, Reuse and Recycle. Through our collaborative partnership we've become more effective in promoting Target Zero Eco Kids presented by MMSM to schools and the public through email blasts, school presentations, advertisements, social media, and video messaging.

MMSM has been a great resource and vital partner. Our community needs their sustained, enthusiastic and creative involvement in order to "...promote the reduction, reuse and recycling of designated packaging and printed paper in the province of Manitoba and to sustainably increase recovery and recycling rates of the designated material."

Kind regards,

Geraldine De Braune
Manager, Sponsorship Development
Office (204) 987-4371 | Mobile (204) 955-5708
geraldine.debraune@tf-np.ca | www.theforks.com



SCOTT HILDEBRAND, City Manager

Phone: 204-729-2204; Fax: 204-729-0975

Email: s.hildebrand@brandon.ca

March 31, 2016

To Whom It May Concern:

It is my pleasure to write this letter on behalf of the City of Brandon in support of the Multi-Material Stewardship Program (MMSM).

Over the years the City of Brandon has developed a very close working relationship with MMSM. Without the partnership that has formed and the continued support that MMSM has provided our organization, the City of Brandon would not be as successful as we are today in regards to the diversion of recyclables that we have accomplished to date.

MMSM has provided numerous tools to our City, such as the development and implementation of the waste audit program. These audits have allowed us to understand our recycling efforts within the community and have given us invaluable insight into areas of improvement that continue to assist us in attaining our overall goal of a 70% diversion rate.

In late 2013 MMSM was also able to assist us through an integral time as our municipality worked through an extensive business plan on deciding whether or not we should internally operate the Material Recovery Facility (MRF) at our Landfill. MMSM offered their professional expertise and vast amount of insight in this area to help us tailor our operational plan to suit the City of Brandon and surrounding municipalities that would be utilizing our facility. Executive members from MMSM spent countless hours meeting with our team from the City to discuss the RFP process and design, the financial cost savings related to the potential changeover, and discussing direct changes that could be made within the facility to ensure a smoother process within the plant for our staff. Now 2 years later, we continue to utilize the strong working relationship that we have developed with MMSM for recommendations on procedures to ensure that our operations remain efficient and run smoothly.

In addition, MMSM has also been an integral resource for assisting our Environmental Initiatives Section on educating our youth in waste diversion through the Bag Up Manitoba Challenge and the Brandon Waste Reduction School Challenge.

To conclude, on behalf of the City of Brandon, I fully support the efforts of MMSM. The assistance that is provided to us on an ongoing basis through MMSM has helped us achieve great success in recycling. We are very grateful for the assistance that MMSM has provided us in the past and look forward to continuing to work together in years to come as we work towards the goals to increase recycling in our Community.

Sincerely,

A handwritten signature in blue ink, appearing to read "SH", with a large circular flourish at the end.

Scott Hildebrand
City Manager

Karen Melnychuk - MMSM

From: Sandra Broek <assistant@lacdubonnet.com>
Sent: Friday, April 08, 2016 2:38 PM
To: Karen Melnychuk - MMSM
Subject: MMSM Feedback

Hello Karen

Tannis asked me to respond advising the Council of the RM of Lac du Bonnet supports the MMSM program.

Sandra Broek
Assistant Administrator/Finance Officer
RM of Lac du Bonnet
204-345-2619